IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Sharon R. Baird : Chapter 13

Debtor : No. 17-10540-jkf

:

1600 Church Road Condominium :

Association :

Movant

V.

Sharon R. Baird :

Respondent :

OBJECTION TO CHAPTER 13 PLAN By 1600 CHURCH ROAD CONDOMINIUM ASSOCIATION

1600 Church Road Condominium Association, by its attorney, Hal A. Barrow, Esquire, hereby objects to the confirmation of the Debtor's Chapter 13 Plan and in support thereof asserts:

- The Association is the Condominium Association responsible for administration
 of the 1600 Church Road Condominium. Debtor's principal asset and residence is a Unit in the
 Condominium.
- 2. At the time the Petition was filed, the Debtor was indebted to the Association for more than \$53,042.17 on account of unpaid assessments, late fees, interested, fines and legal fees.
- 3. The Association obtained a judgment against debtor in the Court of Common Pleas on July 25, 2016 in the amount of \$38,879.13.
- 4. The Association is a secured creditor of the Debtor, holding a statutory lien for all assessments and other charges due to the Association, and a judgment lien. The statutory lien is

granted by the terms of the Declaration of Condominium and the Pennsylvania Uniform Condominium Act, 68 P.A.C.S. § 3315.

- 5. The Association's claim is fully secured, by virtue of it statutory lien and its judgment lien.
- 6. The Association believes that the Debtor is not acting in good faith. Debtor's Schedules do not provide for the full amount of the Association's claim and her Financial Statement does not show sufficient income to pay the Plan after her living expenses.

WHEREFORE, 1600 Church Road Condominium Association respectfully requests that Debtor's Chapter 13 Plan be rejected and that these proceedings be dismissed.

BARROW | HOFFMAN

By: /s/ Hal A. Barrow Hal A. Barrow, Esquire 65 W. Street Road, Suite B102 Warminster, PA 18974 (215) 956-9099

March 31, 2017